

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

No. 5:21-cr-27-BO(1)

UNITED STATES OF AMERICA)

v.)

SAMUEL UGBERAESE)
a/k/a "Putsammy," and)

OLUWADAMILARE KOLAOGUNBULE)
a/k/a "Dare")

INDICTMENT

The Grand Jury charges that, at all relevant times:

Introduction

1. The term "romance scam" refers to a type of criminal scheme in which scammers create fake profiles on Internet dating sites for the purpose of identifying and exploiting victims for profit. In a typical scenario, the scammers feign romantic interest in the victims in order to gain their affection and trust. Upon doing so, the scammers use false pretenses, often fabricated personal emergencies, as a means of manipulating victims into sending money and performing other tasks on their behalf.

2. The term "Drop Account" refers to a bank account used, in whole or in part, to receive, move, process, convert, and obscure criminal proceeds, including funds obtained or derived from romance scam victims.

3. SAMUEL UGBERAESE, a/k/a "Putsammy," ("UGBERAESE") was a Nigerian citizen residing in South Africa. In or about September 2014, UGBERAESE applied for and obtained a tourist visa to enter the United States. In or about

December 2014, UGBERAESE entered the United States and established residency in the Atlanta, Georgia area until in or about June 2016, when his visa was cancelled by border authorities at Hartsfield-Jackson Atlanta International Airport in Atlanta, Georgia.

4. OLUWADAMILARE KOLAOGUNBULE, a/k/a "Dare," ("KOLAOGUNBULE") was a naturalized United States citizen, originally from Nigeria, residing in the Atlanta, Georgia area. KOLAOGUNBULE owned "DSC Exports LLC" and "Belmont Integrated Logistics LLC," purported businesses incorporated in the State of Georgia.

5. KOLAOGUNBULE opened, maintained, and controlled multiple Drop Accounts, including the accounts listed below:

Opening Date	Financial Institution	Account No. (Last Four)	Registered Account Holder
12/16/02	Navy Federal Credit Union	*****2700	Oluwadamilare Kolaogunbule
07/12/06	Bank of America	*****8885	Oluwadamilare Kolaogunbule
09/28/12	JPMorgan Chase	*****9600	Oluwadamilare Kolaogunbule
03/16/13	Wells Fargo	*****9365	Oluwadamilare Kolaogunbule
08/12/16	JPMorgan Chase	*****3655	DSC Exports
10/28/16	Navy Federal Credit Union	*****7091	DSC Exports
01/17/17	Fifth Third Bank	*****8994	DSC Exports
08/29/17	SunTrust Bank	*****0617	DSC Exports
12/14/17	Delta Community Credit Union	*****3521	Belmont Integrated Logistics

COUNT ONE

6. The preceding paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

7. Beginning no later than in or about 2014, and continuing until at least in or about 2018, in the Eastern District of North Carolina and elsewhere, the defendant,

SAMUEL UGBERAESE,
a/k/a "Putsammy,"

did knowingly and willfully combine, conspire, confederate, and agree with other persons, known and unknown to the Grand Jury, to knowingly devise a scheme and artifice to defraud, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises (the "scheme to defraud"), and for the purpose of executing and attempting to execute the scheme to defraud did knowingly and willfully transmit and cause to be transmitted by means of wire communication, in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

Object of the Conspiracy

8. It was the object of the conspiracy that UGBERAESE and his co-conspirators conducted romance scams targeting female victims in the United States and elsewhere for the purpose of enriching themselves and each other with the unlawful proceeds of such scams.

Manner and Means

Among the manner and means used to effect and accomplish the object of the conspiracy included, but were not limited to, the following:

9. It was part of the conspiracy and scheme to defraud that UGBERAESE and his co-conspirators conducted romance scams by targeting victims on online dating websites.

10. It was further part of the conspiracy and scheme to defraud that UGBERAESE and his co-conspirators initiated, promoted, and exploited fraudulent

and fictitious romantic relationships with the targeted victims for the purpose of obtaining money from them. To form romantic relationships with the victims, UGBERAESE and his co-conspirators used phone conversations, emails, and other methods of electronic communication.

11. It was further part of the conspiracy and scheme to defraud that UGBERAESE and his co-conspirators used false stories and promises to convince the victims to transfer money on their behalf.

12. It was further part of the conspiracy and scheme to defraud that UGBERAESE and his co-conspirators used Drop Accounts to receive, transfer, and otherwise convert fraudulently obtained funds from victims.

13. It was further part of the conspiracy and scheme to defraud that UGBERAESE and his co-conspirators caused the victims to use the wires to transfer money to the Drop Accounts. Thereafter, the victim funds were disbursed by using wires to transfer money to other accounts, by initiating account transfers to other accounts at the same bank, by withdrawing sums of money, and by transferring funds to other individuals and entities.

Overt Acts

In furtherance of the conspiracy, and to achieve the unlawful objects thereof, one or more of the co-conspirators committed and caused to be committed the following overt acts, among others, in the Eastern District of North Carolina and elsewhere:

Jane Doe 1

14. Jane Doe 1 was a resident of Charleston County, South Carolina. In 2014, Jane Doe 1 met an individual who identified himself as "Paul Edward" on www.chemistry.com, a dating website. "Edward" claimed to hail from Ireland and have a teenage daughter. "Edward" was, in fact, a fraudulent persona associated with UGBERAESE.

15. "Edward" told Jane Doe 1 that he was a civil engineer and had accepted work on a project in South Africa. Shortly after his arrival, "Edward" told Jane Doe 1 that a site worker on the project was injured and he was responsible for the associated financial costs. "Edward" continued to report a series of emergencies in order to support requests for more money from Jane Doe 1.

16. Jane Doe 1 transferred funds to various accounts at "Edward's" direction, including Drop Accounts maintained by KOLAOGUNBULE at Bank of America and Wells Fargo.

Jane Doe 2

17. Jane Doe 2 was a resident of Wake County, North Carolina, within the Eastern District of North Carolina. In 2016, a co-conspirator contacted Jane Doe 2 on Match.com, a dating website. The co-conspirator introduced Jane Doe 2 to his "friend," an individual identifying himself as "Michael Alex". "Alex" claimed he was an engineer working on a project in South Africa.

18. "Alex" sent photographs of himself to Jane Doe 2 and communicated with her on the phone and through emails and text messages.

19. After winning Jane Doe 2's trust by falsely professing his romantic interest, "Alex" solicited Jane Doe 2 to wire money to third parties. At "Alex's" direction, Jane Doe 2 wired funds to various Drop Accounts.

20. On August 30, 2017, for example, Jane Doe 2 wired \$10,000 to a Drop Account at Navy Federal Credit Union ending 7091. The account was registered to DSC Exports and maintained and controlled by KOLAOGUNBULE.

21. On August 30, 2017, UGBERAESE sent the following text message to KOLAOGUNBULE: "pls check navy federal for 10K."

22. On or about September 1, 2017, UGBERAESE sent the following text message to KOLAOGUNBULE (errors in original): "Hello Uncle. What's happening? People are calling me nor stop."

23. On or about September 1, 2017, KOLAOGUNBULE responded to UGBERAESE with the following text message (errors in original): "Wat do you mean wats happening? We will do better in communication, be rest assured ur funds are very safe and u shld know that by now."

Jane Doe 3

24. Jane Doe 3 was a resident of Wake County, North Carolina, within the Eastern District of North Carolina. In 2017, a co-conspirator contacted Jane Doe 3 on Match.com. The co-conspirator introduced Jane Doe 3 to his "friend," an individual identifying himself as "Timothy Greene". "Greene" claimed he had accepted an engineering contract in Cape Town, South Africa.

25. "Greene" sent photos of himself to Jane Doe 3 and communicated with her by electronic means. The photos matched the photos that "Michael Alex" had sent to Jane Doe 2 above.

26. "Greene" convinced Jane Doe 3 to make wire transfers to a Drop Account at JPMorgan Chase ending 3655. The account was registered to DSC Exports and maintained and controlled by KOLAOGUNBULE.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

27. The preceding paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

28. Beginning in or about 2014, and continuing until at least in or about 2018, in the Eastern District of North Carolina and elsewhere, the defendants,

SAMUEL UGBERAESE,
a/k/a "Putsammy,"
and
OLUWADAMILARE KOLAOGUNBULE,
a/k/a "Dare,"

did knowingly and willfully combine, conspire, confederate, and agree with other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly conduct financial transactions affecting interstate and foreign commerce, which financial transactions involved the proceeds of specified unlawful activity—namely, the proceeds of conspiracy to commit wire fraud, in violation of Title 18, United States Code, Section 1349—knowing that the property involved in the financial transactions represented the proceeds of some form

of unlawful activity, and knowing that the transactions were designed, in whole or in part, to conceal and disguise the nature, location, source, ownership, and control of proceeds of said specified ^{unlawful} ~~lawful~~ activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i). *ay/2*

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any offense charged herein constituting "specified unlawful activity" (as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1)), or a conspiracy to commit such offense, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), as made applicable by 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the said offense.

Upon conviction of any violation of 18 U.S.C. §§ 1956, 1957 or 1960 charged herein, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

The forfeitable property includes, but is not limited to, the following:

Forfeiture Money Judgment:

- a) A sum of money representing the gross proceeds of the offense(s) charged herein against SAMUEL UGBERAESE, in the amount of at least \$2,367,520.

b) A sum of money representing the value of the property involved in the money laundering offense(s) charged herein against SAMUEL UGBERAESE and OLUWADAMILARE KOLAOGUNBULE, in the amount of at least \$2,367,520.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL

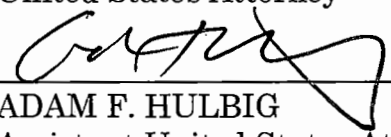
REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOR PERSON

Date: 1/22/2021

ROBERT J. HIGDON, JR.
United States Attorney


ADAM F. HULBIG
Assistant United States Attorney
Criminal Division